

AO91 (Rev. 12/03) Criminal Complaint

AUSA

FILED**UNITED STATES DISTRICT COURT**

AUG - 1 2019

Western District Of Texas Del Rio Division

CLERK U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY *[Signature]*
DEPUTY**UNITED STATES OF AMERICA****CRIMINAL COMPLAINT**

vs.

Cody Lee HORNER
Jenny ANKENY

Case Number: DR:19-7046M-01,02

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about July 30, 2019 in Kinney County, inthe Western District Of Texas defendant(s),

knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii)I further state that I am a(n) Border Patrol Agent and that this complaint is based on the

following facts:

On July 30, 2019, Border Patrol Agents arrested Cody Lee HORNER and Jenny ANKENY, both United States citizens near Brackettville, Texas which is in the Western District of Texas for transporting three illegal aliens in furtherance of their illegal entry. HORNER, in a sworn statement admitted he conspired with another individual from San Antonio, Texas to transport illegal aliens from Eagle Pass, Texas to San Antonio and would be paid \$800 USD to do so. ANKENY stated HORNER asked her to borrow her vehicle and accompany him in this failed smuggling event. ANKENY also stated she knew the people being picked were illegally present in the United States. Material witness Diego Adrian CAMPOS-Chavez a citizen of El Salvador and illegally present in the United States will testify he made smuggling arrangements in Mexico. CAMPOS-Chavez positively identified both defendants from a photo line-up.

Continued on the attached sheet and made a part of this complaint:

☐ Yes ☒ No*[Signature]*
Signature of Complainant~~Velaz, Gregorio~~ RODRIGUEZ, Stephanie
Printed Name of Complainant

Sworn to before me and signed in my presence,

August 01, 2019

Date

at

Del Rio, Texas

City/State

[Signature] USM
Name of Judge Title of Judge*[Signature]*
Signature of Judge